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*Attorneys for the Motors Liquidation Company  
GUC Trust Administrator*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.  
: :  
MOTORS LIQUIDATION COMPANY, *et al.*, : 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* : (Jointly Administered)  
Debtors. :  
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**CERTIFICATE OF NO OBJECTION**

Pursuant to 28 U.S.C. § 1746, Local Bankruptcy Rule 9075-2 and the *Sixth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures* dated May 5, 2011 [Doc. No. 10183] (the “**Sixth Amended Case Management Order**”), the undersigned hereby certifies as follows:

1. On November 17, 2015, Wilmington Trust Company, in its capacity as trust administrator and trustee of the Motors Liquidation Company GUC Trust (in such capacity, the “**GUC Trust Administrator**”), filed a Motion of Wilmington Trust Company, as GUC Trust Administrator, for an Order (A) Granting Authority to Reallocate and Use Distributable Cash for the Purposes of Funding Administrative and Reporting Fees, Costs and Expenses of the GUC Trust and (B) Extending the Duration of the GUC Trust [ECF No. 13543] (the “**Motion**”).

2. On November 17, 2015, the GUC Trust Administrator (through its agent, Garden City Group, LLC) served notice of the Motion on (a) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004, (b) the parties in interest in accordance with the Sixth Amended Case Management Order, and (c) all other required notice parties under Section 6.1(b)(iv) of the GUC Trust Agreement. *See* ECF No. 13553.

3. The deadline for submitting objections to the Motion was December 1, 2015 at 4:00 p.m. (Eastern Time) (the “**Objection Deadline**”).

4. The undersigned counsel represents that (i) more than forty-eight (48) hours has passed since the expiration of the Objection Deadline, (ii) it has reviewed the Court’s docket not less than forty-eight (48) hours after the expiration of the Objection Deadline, (iii) no objections, responsive pleadings, or requests for hearing appear on the Court’s docket, and (iv) no objections, responsive pleadings, or requests for a hearing have been filed or served on the GUC Trust Administrator with respect to the Motion.

5. An electronic copy of the proposed order that was annexed to the Motion will be re-submitted to the Court, along with this Certificate of No Objection pursuant to the Sixth Amended Case Management Order.

Based on the foregoing, the GUC Trust Administrator respectfully requests that the proposed order be entered.

Dated: New York, New York  
December 3, 2015

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Matthew J. Williams

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